

Strategic Plan

SP-05 Overview

Strategic Plan Overview

The mission of the Housing and Neighborhood Development Department is to enhance the quality of life for Bloomington residents by developing programs, services and partnerships to preserve community character, promote affordable housing and encourage neighborhood vitality.

Throughout this document, the needs are fairly consistent; the need for additional affordable housing units for a variety of housing situations and institutional capacity to effectively coordinate and collaborate to maximize service impacts.

To that end, HAND will work on the following:

1. Support programs that provide a safety-net to those in most need, create and preserve affordable housing, create and preserve infrastructure in qualified areas, and assist in the development/modification of facilities to better serve the community.
2. Work to develop collaborations that will have a positive collective impact on services for community populations such as the homeless or those with special needs.
3. Develop creative ways to encourage workforce housing close to employment centers.
4. Work to improve operating efficiency in order to maximize ever decreasing resources and to find partners and options that help maximize federal dollars.

See below for more specific outcomes.

SP-10 Geographic Priorities – 91.215 (a)(1)

Geographic Area

Table 1 - Geographic Priority Areas

General Allocation Priorities

Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA)

Area Name	Area Type
City-wide	Local Target area
BUEA Boundaries	Local Target area

As there are no specific areas of the city with a concentration of housing problems, the City of Bloomington's approach to investment is inclusive and driven by need and opportunity. This allows us to assist projects throughout the city to further create a income diverse environment. HAND has added the boundaries of the Bloomington Urban Enterprise Association, which is essentially the west-side, specifically for infrastructure improvements. This area of the city is in need of infrastructure such as storm water improvements, pedestrian pathways, and sewer laterals and connections.

SP-25 Priority Needs - 91.215(a)(2)

Priority Needs

Table 2 – Priority Needs Summary

Narrative (Optional)

Strategies to meet the above outlined needs/priorities include:

Strategy 1: Increase the number of affordable housing units.

1. Assist for-profit and non-profit developers with the cost of creating affordable housing units by subsidizing the construction/rehabilitation costs for low income individuals/families and by providing low cost construction financing.
2. Assist for-profit and non-profit developers in meeting Planning requirements by waiving sewer hook-on fees for affordable housing projects and by assisting with the cost of infrastructure improvements such as sidewalks.
3. Provide down payment and closing cost assistance to income eligible applicants.
4. Provide assistance to housing programs that target homeless individuals or households where appropriate through programs such as HOME assistance to developers, Tenant Based Rental Assistance and/or Shelter + Care.
5. Study options to develop workforce housing (81 - 125% Area Median Income).
6. Provide technical assistance to for-profit and non-profit developers.

Strategy 2: Improve existing owner-occupied structures for low income individuals/families.

1. Provide zero-percent interest loans to rehabilitate owner-occupied homes focusing on code related repairs, energy efficiency upgrades, accessibility modifications (if appropriate), and historic exterior upgrades (if appropriate).
2. Provide funding to make emergency repairs that threaten the health and safety of occupants.
3. Provide funding to make accessibility modifications for both owner-occupied and rental units so that qualified applicants may remain in their homes.
4. Assist non-profit organizations with the cost of rehabilitating existing owner-occupied structures.

Strategy 3: Create or improve infrastructure in target areas:

1. Provide funding for the creation and/or repair of water/sewer lines in areas that are not served or where infrastructure is breaking down.
2. Provide funding pedestrian pathways such as sidewalks (including curb improvements),

ADA transition ramps, and multi-purpose pathways.

Strategy 4: Improvement of Public Facilities:

1. Provide funding to non-profits for the improvement of public facilities that are primarily used by HAND target populations.
2. Provide funding to improve neighborhood parks in HAND target areas.

Strategy 5: Public Service Assistance:

1. Provide funding to non-profit organizations that serve low income individuals/families with their basic emergency needs: food, shelter and health care.
2. Provide funding to non-profit organizations that provide a safety net for community members in need.
3. Provide funding to non-profit organizations that provide valuable services to improve quality of life.

Strategy 6: Provide education and assistance:

1. Provide home buyer education to interested parties through the Home Buyer's Club. Successful graduates may be eligible for down payment and closing cost assistance.
2. Provide rental education to interested parties through R101 - Renting in Bloomington. Successful graduates may be eligible for damage deposit loan assistance (general fund).
3. Provide reverse mortgage counseling to seniors interested in exploring a reverse mortgage to reduce their cost burden.
4. Provide predatory loan education to groups like Habitat's homeownership education program and/or other social service agencies upon request.

SP-30 Influence of Market Conditions – 91.215 (b)

Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	TBRA is the quickest way to house those with difficult circumstances who are on the Housing Choice Voucher waiting list. The City of Bloomington partners with the Bloomington Housing Authority to provide assistance. This Consolidated Plan, the City also plans to partner with Centerstone (mental health provider) to provide TBRA to their clients in difficult circumstances who are waiting for housing assistance.
TBRA for Non-Homeless Special Needs	See above.
New Unit Production	As noted throughout this document, cost burden is the dominate housing issue in Bloomington. The City of Bloomington will continue to partner with organizations such as Habitat or tax credit developers to add new units of affordable owner-occupied and rental housing as opportunities allow.
Rehabilitation	Cost burden is not only the rental or mortgage payment, but also the cost of operating the house. Forty-one percent (41%) of Bloomington's housing stock was built prior to 1979 and 12% was built before 1950. It is important for the health and well-being of the residents to bring older housing stock up to current code, improve energy efficiency, and encapsulate lead based paint exposure. The City of Bloomington will continue to with its Owner-Occupied Rehabilitation Program in order to continue to improve existing housing stock and create stable neighborhoods.
Acquisition, including preservation	Available land suitable for housing development is difficult to find in Bloomington. The City of Bloomington will help in the acquisition of appropriate land for development when opportunities arise.

Table 3 – Influence of Market Conditions

SP-35 Anticipated Resources - 91.215(a)(4), 91.220(c)(1,2)

Introduction

These federal funds are an important part of the resources used to meet the goals outlined in this document; however, as they continue to decline other resources become important in meeting the needs of the community. Some of those resources, discussed in this plan, include the Jack Hopkins Council Social Service Grant Program (general fund), code enforcement (general fund), historic preservation (general fund), and economic development (through resources outlined above).

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	Federal	Acquisition Admin & Planning Econ Development Housing Public Improve. Public Services	\$797,468	\$23,000	\$129,590	\$950,058	\$950,058	We anticipate receiving an average of \$700,000 per year for the remaining four years of our Consolidated Plan.
HOME	Federal	Acquisition Homebuyer Asst. Homeowner Rehab. Rental New Constr. Rental Rehab. New Const. for Ownership TBRA	\$469,559	\$40,000	\$	\$509,559		We anticipate receiving an average of \$400,000 per year for the remaining four years of our Consolidated Plan.

Table 4 - Anticipated Resources

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

The City leverages funds from private and non-federal public sources in several ways: 1) Infrastructure provided by general or enterprise (utilities) funding; 2) Infrastructure provided by private developers; 3) Private mortgages; 4) Infrastructure/projects funded by Tax Increment Financing District(s); 5) Community Revitalization Enhancement District Funds; 6) Certified Technology Park funds; and 7) Bloomington Housing Trust Fund.

Historically, Bloomington has met match requirements with the following: 1) Cash contributions (from non-federal resources); 2) Foregone taxes, fees, and charges; 3) Appraised land/real estate; 4) Non-federal on-site and off-site infrastructure improvements to affordable housing projects; 5) Site preparation, construction material and donated labor.

If appropriate, describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

At this time, the City of Bloomington has no public owned land or property located within the jurisdiction that will be used to carry out the plan.

Discussion

CDBG funds will be allocated through the Citizen Advisory Council so that allocations will continue to meet the needs of the community as defined in this document and as they emerge. HOME funds will be allocated using program guidelines to use opportunities to meet community needs. The City will continue to invest general fund money into the preservation of our community through our Historic Preservation Program, code enforcement efforts and through the Jack Hopkins Council Social Service Grant Program.

SP-40 Institutional Delivery Structure – 91.215(k)

Explain the institutional structure through which the jurisdiction will carry out its consolidated plan including private industry, non-profit organizations, and public institutions.

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
City of Bloomington Housing and Neighborhood Development	Local unit of government	Lead	City limits of Bloomington, Indiana

Table 5 - Institutional Delivery Structure

Assess of Strengths and Gaps in the Institutional Delivery System

Bloomington's social service network's strengths are with the wide variety of services available to those in need. While doing on-street interviews with persons who are either homeless or at risk of homelessness we asked "Do you need any assistance for which you have not been able to find an agency in Bloomington to help?" and responses were all for assistance that existed. The gap in the institutional delivery system is educating those in need about what services exist and how to access them.

Availability of services targeted to homeless persons and persons with HIV and mainstream services

Homelessness Prevention Services	Available in the Community	Targeted to Homeless	Targeted to People with HIV
Homelessness Prevention Services			
Counseling/Advocacy	Y	Y	Y
Legal Assistance	Y	Y	Not specifically
Mortgage Assistance	Y/N	Not specifically	Not specifically
Rental Assistance	Y	Y	Y
Utilities Assistance	Y	Y	Y
Street Outreach Services			
Law Enforcement	Y	Y	Not specifically
Mobile Clinics	N	N	N
Other Street Outreach Services	Y	Y	Not specifically

Supportive Services			
Alcohol & Drug Abuse	Y		
Child Care	Y		
Education	Y		
Employment and Employment Training	Y		
Healthcare	Y		
HIV/AIDS	Y		Y
Life Skills	Y		
Mental Health Counseling	Y		
Transportation	Y		
Other			
Other			

Table 6 - Homeless Prevention Services Summary

Describe how the service delivery system including, but not limited to, the services listed above meet the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)

Creating a service delivery system where individuals/families, particularly those who are chronically homeless, can locate and access needed services is complicated. In Bloomington, often individuals/families who are homeless or at risk of homelessness learn about valuable services at the Shalom Community Center. Noted below are agencies who provide services listed above to homeless persons. This is not an exhaustive list.

The **Shalom Community Center** is a daytime resource center for people who are living in poverty and experiencing its ultimate expressions: hunger, homelessness, and a lack of access to basic life necessities. Agencies who provide services at the Shalom Community Center include Veterans Assistance (VA), Positive Link (HIV/AIDS), Social Security, Indiana Legal Services, and the Broadview Learning Center.

The **BPD (Bloomington Police Department) Outreach Program** was launched on April 1, 2014 to is to find a better alternative to arrest when dealing with the consequences of either being homeless or at risk for homelessness and to coordinate services to individuals encountered by BPD Resource Officers and/or the Street Social Worker.

Catholic Charities provides individual and family counseling and provides Bloomington Social Service agencies professional training on various mental health issues. The agency also provides counseling for parents and teaches of students who are experiencing behavior, social or learning barriers. For example, Catholic Charities received a Jack Hopkins Grant to work with parents and students of Fairview School.

Centerstone is a community based behavioral healthcare provider for persons with serious mental illness and/or substance abuse disorders. They provide a full range of services from 24-hour crisis services to outpatient services to psychiatric services. They also have residential and employee assistance programs.

Community Kitchen and **Mother Hubbard's Cupboard** work to eliminate hunger through prepared meal programs (Community Kitchen) or access to healthy foods.

Indiana Legal Services provides equal access to justice by providing free legal representation, consultation and advice in the areas of family law, consumer law, senior law, housing issues, and public benefits.

Positive Link, a program of IU Health Bloomington Hospital, provides comprehensive prevention and holistic social services to those impacted by HIV. Services include housing and utilities assistance.

The **South Central Housing Network** is the Indiana Balance of State Continuum of Care Region 10 Planning Council that supports the development and maintenance of solutions to address homelessness.

Stepping Stones provides transitional housing and supportive services to youth 16-20 years old who are experiencing homelessness.

Volunteers in Medicine of Monroe County, in cooperation with others in the community, provides easily accessible, quality primary and preventative healthcare, treatment for both acute and chronic conditions, and health education that empowers individuals to take responsibility for their own well being to the medically underserved in Monroe County.

Describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above

The service delivery system is further strengthened by the BPD Outreach Program. The BPD Resource Officers and Street Social Worker provide information to individuals experiencing homelessness that they encounter on the streets. The BPD Outreach Program Advisory Committee, made up of organizations such as the Bloomington Police Department, City of Bloomington Housing and Neighborhood Development Department, Shalom Community Center, Centerstone, IU Health Bloomington Hospital, Volunteers in Medicine, LifeDesigns, the Monroe County Public Library, Monroe County Probation, Martha's House, and the faith community. These organizations help determine gaps in services and provide constructive ways to fill those gaps. Through this program, the City has funded a street social worker

through Shalom Community Center and employment, mental health & prescription assistance through Centerstone.

Provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs

As noted above, the BPD Outreach Advisory Committee, along with the South Central Housing Network, provides strategies for overcoming gaps in institutional structure and service delivery. The BPD Outreach Advisory Committee meets every month to discuss service delivery and gaps based on the input and suggestions of the BPD Resource Officers and the Street Social Worker. Gaps are funded through a grant received from the Jack Hopkins Council Social Service Grant Program. The South Central Housing Network meetings every other month (with executive board meetings between) to discuss housing services, the Continuum of Care, and the implementation of *Heading Home*.

SP-45 Goals Summary – 91.215(a)(4)

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Developer subsidy -- owner-occupied	2015	2019	Affordable housing	City-wide	Affordable housing units	HOME	Homeowner housing added
2	Developer subsidy - rental	2015	2019	Affordable housing	City-wide	Affordable housing units	CDBG/HOME	Rental units constructed
3	Direct housing assistance -- owner-occupied	2015	2019	Affordable housing	City-wide	Affordable housing units	CDBG	Direct financial assistance to homebuyers
4	Rental assistance	2015	2019	Affordable housing/Non-homeless special needs	City-wide	Affordable housing units	HOME	Tenant Based Rental Assistance
5	Owner-occupied rehabilitation	2015	2019	Affordable housing	City-wide	Affordable Housing units/Improve existing structures	CDBG	Homeowner Housing Rehabilitated
6	Create or improve infrastructure	2015	2019	Non-housing community development	City-wide	Infrastructure improvements	CDBG	Public facility or infrastructure activities other than Low-Moderate Income Housing Benefit
7	Improvement of Public Facilities	2015	2019	Non-housing community development	City-wide	Public facilities	CDBG	Public facility or infrastructure activities other than Low-Moderate Income Housing Benefit
8	Public service assistance	2015	2019	Homeless/Non-housing community development	City-wide	Public service assistance	CDBG	Public service activities other than Low/Moderate Income Housing Benefit
9	Grant administration	2015	2019	Other	City-wide	All	CDBG/HOME	Other

Table 7 – Goals Summary

Goal Descriptions

See SP-25 Priority Needs

Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.315(b)(2)

Goal Name	Estimated service
Developer subsidy -- owner-occupied	20
Developer subsidy - rental	23
Direct housing assistance -- owner-occupied	15
Rental assistance	30
Owner-occupied rehabilitation	55
Create or improve infrastructure	39,000
Improvement of Public Facilities	40,000
Public service assistance	50,000
Grant administration	NA

SP-50 Public Housing Accessibility and Involvement – 91.215(c)

Need to Increase the Number of Accessible Units (if Required by a Section 504 Voluntary Compliance Agreement)

The Bloomington Housing Authority has been working to rehabilitate the public housing units at Crestmont and Reverend Butler. That includes renovating for accessibility. They currently have 44 accessible units. The Bloomington Housing Authority also makes accessibility modifications upon request.

Activities to Increase Resident Involvements

The Bloomington Housing Authority (BHA) is committed to providing self-sufficiency services to its tenants through the Step-Up program, funded through the HUD Resident Opportunity and Self-Sufficiency (ROSS) grant, and this programming has grown over the years to include one full time and one part time staff member. There are currently 40 public housing residents enrolled pursuing educational, employment or aging-in-place goals.

The on-site Boys and Girls Club provides a substantial summer and after school program for children of all ages. The Boys and Girls Club offers after school tutoring, a garden club, an active reading and homework help program along with career explorations, a computer lab, dance and art classes, swimming, etc. During the past five years a Lego league started and has won at competition as well as a chess club with participants as young as 6 and as old as 65.

Examples of programs for residents offered in our Community Building are adult high school equivalency classes, Work Keys testing, Fall Fest and Haunted House, Family Night Out, Healthy Homes, Health and Wealth Expo, Holiday Party for all residents, Santa's Workshop to make your own gifts, Learn to Do your own taxes workshop and college entrance workshop.

Is the public housing agency designated as troubled under 24 CFR part 902?

No. The Bloomington Housing Authority is a high performer.

Plan to remove the 'troubled' designation

SP-55 Barriers to affordable housing – 91.215(h)

Barriers to Affordable Housing

Barriers to affordable housing can be broken down into two main categories; economic factors and regulatory factors.

Economic Factors:

1. There are insufficient financial resources to meet the housing needs for all persons. As outlined above, the demand for affordable housing exceeds the supply of affordable housing.
2. There are insufficient financial resources to Housing Choice Vouchers for households in need. There are approximately 695 people on the HCV waiting list.

Regulatory Factors:

1. Local factors:

Prior to the City's adoption of the Unified Development Ordinance (UDO) in 2007, the common zoning approach to creating affordable housing units was for developers, non-profit affordable housing providers and the City itself to develop affordable housing units either through the rezoning process (most typically through Planned Unit Developments) or via the variance process.

2. State factors:

Indiana Code 36-7-15.1-35.5 allows for the development of a housing trust fund.

2015 House Bill 1300 -- This Bill proposes amending IC 36-1-3-8.5 as follows:

"Sec. 8.5. A unit may not adopt or enforce an ordinance that requires or would have the effect of requiring a landlord to participate in: (1) a Section 8 program of the federal Housing Act of 1937 (42 U.S.C. 1437f); or (2) a similar program concerning housing."

2015 Senate Bill 415 -- This Bill proposes amending IC 32-30-10.5-12 as follows:

"Sec. 12. This chapter does not apply to a mortgage that is serviced by a mortgage servicer that is subject to the requirements of 12 CFR 1024.39, 12 CFR 1024.40, and 12 CFR 1024.41."

Please refer to the Analysis of Impediments to Fair Housing for further information on regulatory barriers. Please see Enhanced version of the Consolidated Plan 2015-2019 for additional details.

Strategy to Remove or Ameliorate the Barriers to Affordable Housing

Economic Factors:

1. There are insufficient resources to meet the need for affordable housing. The City of Bloomington will continue to maximize resources by leverage funds from other sources such as Low Income Housing Tax Credits whenever possible.
2. The City of Bloomington will continue to provide assistance to those most in need on the Housing Choice Voucher waiting list through Tenant Based Rental Assistance.

Regulatory Factors:

1. Local factors: The City of Bloomington, through its Unified Development Ordinance (UDO), continues to prioritize affordable housing through developer incentives such as increased density. Updates to the UDO with regard to affordable housing may be forthcoming after the update to the Growth Policies Plan current under development.
2. State factors: The City of Bloomington will continue to monitor proposed changes to state law as they occur.

SP-60 Homelessness Strategy – 91.215(d)

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City of Bloomington launched the Bloomington Police Department (BPD) Outreach Program on April 1, 2014. Through this program, six police officers volunteered to provide outreach, assessment and referral services to individuals and families experiencing homelessness with particular emphasis on the unsheltered they encounter on the street. As part of this program, the City of Bloomington provided funds to subsidize a street social worker through the Shalom Community Center that works closely with the Resource Officers to provide alternatives to the homeless encountered by BPD. Many of the needed resources already existed in the community, but this program brought them together to talk about how to work collaborative to reach this demographic and to determine what gaps in services exist and how to fill those gaps.

Outreach to homeless continues through the Shalom Community Center, a daytime resource center for people who are living in poverty. In addition to the resource center, Shalom provides meals, employment assistance and is the gateway into Rapid Rehousing.

Addressing the emergency and transitional housing needs of homeless persons

As outlined in MA-30 Homeless Facilities above, Bloomington has a number of emergency shelter for homeless individuals and families and victims of domestic violence and transitional housing units for victims of domestic violence and displaced youth. The City of Bloomington will continue to support these efforts, as appropriate, through its regular Community Development Block Grant and Jack Hopkins Council Social Service Grant Program funding processes. Over the past five years, the City has invested \$606,492.37 in emergency shelter and transitional housing. Please note that as outlined below, the Heading Home report focuses on permanently supportive housing which will be the emphasis of any new developments under this plan.

It would be remiss not to mention that during the community data collection process, there were a number of references made regarding a year-round low-barrier shelter. During the winter months (November - March), the Inter-Faith Winter Shelter provides low-barrier sheltering. The only year round shelters are high barrier (must be sober). There were also references made to the need for a local detox center/program. The closest detox center/program is in Louisville, Kentucky. There is a group considering opening a detox center/program at this time.

The South Central Housing Network's *Heading Home: A Regional Plan to Make Homelessness Rare, Brief & Nonrepeating* suggests the following goal: To make homelessness brief, invest in strategies that rapidly move homeless individuals and families into homes. The South Central Housing Network will focus on the implementation of their Plan over the next five years which encourages a "housing first" model. Bloomington recently developed its first permanently support housing apartment complex with 25 units for individuals; although Bloomington has had permanently supportive housing programs through Centerstone Shelter + Care and Positive Link for years.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again.

The South Central Housing Network's *Heading Home: A Regional Plan to Make Homelessness Rare, Brief & Nonrepeating* goals/strategies include, but are not limited to:

- Sift from a housing readiness to a housing first approach, rapidly rehousing those who have fallen into homelessness.
- Work with Public Housing Authorities to expand opportunities for households experiencing homelessness.
- Use Transitional Housing strategically to focus on survivors of domestic violence, those with substance use disorders, and unaccompanied youth.
- Create a detox center for individuals experiencing or at imminent risk of homelessness and facing addiction to alcohol or drugs.
- Expand outreach to difficult-to-reach populations, including those involved in the criminal justice system.

Help low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from a publicly funded institution or system of care, or who are receiving assistance from public and private agencies that address housing, health, social services, employment, education or youth needs

- The South Central Housing Network's *Heading Home: A Regional Plan to Make Homelessness Rare, Brief & Nonrepeating*'s identifies as a strategy to "Identify the most vulnerable households and adopt a "whatever it takes" approach to house these households. Action steps include identifying those households and prioritizing resources for these households; apply to the Permanently Supportive Housing Institute to create a new integrated housing development to include both affordable housing and permanently supportive housing; work with Public Housing Authorities to expand opportunities for households experiencing homelessness; use Transitional Housing strategically to focus on survivors of domestic violence, those with substance use disorders, and unaccompanied youth; facilitate access for those who have housing or employment resources outside the region; and provide mediation and legal services for those who are homeless due to conflict (except domestic violence) and other legal concerns.

SP-65 Lead based paint Hazards – 91.215(i)

Actions to address LBP hazards and increase access to housing without LBP hazards

As noted above in MA-20 Condition of Housing, the City of Bloomington the following to increase access to housing without Lead-Based Paint hazards:

1. Bloomington Municipal Code Title 16, the Residential Rental and Lodging Establishment Inspection Program, has not allowed chipping and peeling paint in rental units since 1972. Title 16 states: 16.04.050 Exterior Structure (e) "Peeling, flaking and chipped paint on the exterior of a residential rental unit or its accessory structures shall be eliminated and done in accordance with any applicable rules or regulations established by the United State's Environmental Protection Agency or the Indiana Department of Environmental Management" and in 16.04.060 Interior Structure (f) "Peeling, chipping, flaking or abraded paint shall be repaired, removed or covered and done in accordance with any applicable rules or regulations established by the United State's Environmental Protection Agency or the Indiana Department of Environmental Management."
2. The City of Bloomington Housing and Neighborhood Development Department has four (4) Lead Risk Assessors that provide risk assessments and visual assessments, as appropriate, in all HAND funded housing projects or programs.

How are the actions listed above related to the extent of lead poisoning and hazards?

Due to the implementation of Title 16, the City of Bloomington does not have a significant lead poisoning problem. As noted in MA-20 Condition of Housing above, Southern Indiana Pediatrics does lead testing on all of its patients which allows community health officials to address and potential lead hazards before the child's exhibits lead poisoning symptoms.

How are the actions listed above integrated into housing policies and procedures?

1. All houses in HAND's housing programs are assessed for lead.
2. Every rental unit within the city limits is inspected on a 3, 4, or 5 year rotation basis and any peeling, chipping, flaking or abraded paint is required to be encapsulated in order to achieve compliance for permitting.

SP-70 Anti-Poverty Strategy – 91.215(j)

Jurisdiction Goals, Programs and Policies for reducing the number of Poverty-Level Families

Bloomington's poverty rate is 39.2%, with children under 18 years of age at 27.0%. For persons over the age of 25 with an educational attainment that is less than high school graduate it is 43.7% and with a high school diploma (or equivalency) it is 25.1%.

The City of Bloomington's Anti-Poverty Strategy, which are primarily funded through CDBG, HOME or Jack Hopkins Council Social Service Grant programs, include:

1. Elimination of sub-standard housing and the maintenance of rental housing through the City's Residential Rental and Lodging Establishment Inspection Program (general fund).
2. Provide access to emergency assistance by providing funding through CDBG and the Jack Hopkins Council Social Service Grant Program to agencies that provide said services.
3. Continue to work through the BPD Outreach Committee to provide access to services for those who are homeless or at risk for homelessness.
4. Continue to cooperate with other local funders on anti-poverty strategies such as the United Way of Monroe County that has three initiatives to help individuals and families attain the building blocks of a better life. Those initiatives form the basis for the community's anti-poverty strategy:
 - A. Education: a) enter school ready to learn; b) graduate school ready to earn; and c) continue building job and life skills.
 - B. Earnings: a) gain or maintain stable employment; b) increase and retain income; and c) build savings and assets.
 - C. Essentials: a) sufficient food; b) a stable place to live; c) health care and wellness and d) crisis management skills.

How are the Jurisdiction poverty reducing goals, programs, and policies coordinated with this affordable housing plan

All of the efforts described above are collaborative efforts either with outside agencies or other city departments where the partners coordinate in order to provide maximum benefit to the clients served.

SP-80 Monitoring – 91.230

Describe the standards and procedures that the jurisdiction will use to monitor activities carried out in furtherance of the plan and will use to ensure long-term compliance with requirements of the programs involved, including minority business outreach and the comprehensive planning requirements

It is the goal of the Housing and Neighborhood Development Department to ensure that all programs and projects comply with the applicable regulations and standards governing the actions of the department.

Community Development Block Grant

Physical improvement projects are monitored as follows:

1. Each project is required to fill out an application to be reviewed by the Citizen Advisory Council (CAC) for allocation recommendation. Applications include specific information regarding design of project, cost of project, and beneficiaries.
2. Successfully funded applications are required to sign a funding agreement outlining all of the requirements, regulations and standards.
3. A program manager from HAND will do site inspections periodically throughout the project.
4. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
5. Davis-Bacon and affirmative action monitoring is completed by the contract compliance officer who is a staff attorney in the City of Bloomington Legal Department.
6. The HAND program manager will receive copies of all reports from the Monroe County Building Department, City of Bloomington Planning Department, and/or City of Bloomington Fire Department for compliance with all city and county regulations. If any other inspections are required or completed, a copy of that report must also be supplied to the program manager.
7. The HAND program manager will also monitor for beneficiary compliance before completion in IDIS. Depending upon the project and the agency, monitoring may occur both before and after the project.

Social service programs are monitored as follows:

1. Each project is required to fill out an application to be reviewed by the Citizen Advisory Council (CAC) for allocation recommendation. Applications include specific information about the program funded and the beneficiaries.
2. Successfully funded applications are required to sign a funding agreement outlining all of the requirements, regulations and standards.
3. A program manager from HAND will receive and review all claims for payment. Claims for payment must include beneficiary information.

4. The HAND program manager will monitor for compliance prior to the end of the fiscal year. If needed, monitoring may occur at more regular intervals.

There are two categories of HOME projects; HOME projects administered by HAND and HOME projects administered by CHDOs, Non-Profits, or For-Profit entities. HOME projects administered by HAND are monitored as follows:

1. HAND operates a number of housing projects that are funded by HOME. Each client is required to fill out an application to determine eligibility. Each application is processed by the HAND program manager/loan officer to determine income and residency eligibility and project feasibility.
2. The HAND program manager/construction project manager will inspect each project to determine project costs and requirements.
3. Upon approval of a project, funding agreements and/or mortgages are signed by applicant outlining terms and conditions of funds.
4. The HAND program manager/construction project manager will monitor the progress of the project, ensuring compliance with all building codes and HAND construction standards.
5. Claims for payment are reviewed and approved by the program manager/construction project manager monitoring the project.
6. A final inspection at the completion of the project must be completed prior to the final payment. This inspection also includes obtaining the certificate of occupancy from the Building Department.

HOME projects administered by CHDO's, non-profits or for-profit entities are monitored (annually or as required) as follows:

1. Applications for funding must include specific details about the project, costs and beneficiaries.
2. Successfully funded applications are required to sign a funding agreement, mortgage and/or covenants outlining all of the requirements, regulations and standards.
3. A program manager from HAND will do site inspections periodically throughout the project.
4. Claims for payment are filed, with appropriate documentation, with the program manager. The program manager reviews the claim and approves it for payment.
5. Davis-Bacon and affirmative action monitoring, if applicable, is completed by the contract compliance officer who is a staff attorney in the City of Bloomington Legal Department.
6. The HAND program manager will receive copies of all reports from the Monroe County Building Department, City of Bloomington Planning Department, and/or City of Bloomington Fire Department for compliance with all city and county regulations. If any other inspections are required or completed, a copy of that report must also be supplied to the program manager.

7. The HAND program manager will also monitor for beneficiary compliance. Depending upon the project and the agency, monitoring may occur both before and after the project.

HOME rental projects are monitored (annually or as required) as follows:

1. Each project is monitored as described above; however, on an annual basis each project is monitored for beneficiary compliance.
2. Documentation is provided to the program manager to ensure compliance with the funding agreement/mortgage/covenants. This documentation shows the number of assisted units, income level of residents, utility allowances, and units receiving Section 8 or units receiving TBRA, if applicable.
3. Program manager may contact tenants to verify information provided.
4. Physical inspections of HOME units are handled through HAND's comprehensive rental inspection program. Those inspections verify the physical condition of each unit and insure that they are in compliance with HOME standards and the City's Housing and Property Maintenance Code.

Tenant Based Rental Assistance projects are monitored (annually or as required) as follows:

1. TBRA projects are governed according to their funding agreements.
2. On an annual basis, the HAND program manager meets with the administrator of each TBRA program. The administrator provides the program manager with information program policy and procedures, outreach, participant selection, unit information (including lead-based paint visual and HQS inspections), tenant income documentation, tenant leases, and, if applicable information regarding required self-sufficiency programming.
3. The HAND program manager may meet with the tenants to verify information.
4. Claims for payment must be approved by the HAND program manager and must include applicable documentation.

Substantial amendments to the plan will be determined as follows:

The following shall constitute a substantial amendment to the Consolidated Plan:

A reallocation of fifty percent (or more) of available program funds;

The funding of a project or activity not previously described in the Plan;

A substantial change in the scope, purpose, location or beneficiaries of an activity.

In the event that approval is required from the U.S. Department of Housing and Urban Development (HUD) before the amendment may take effect, a public hearing shall be held. Notice of the public hearing will be published in the local newspaper at least ten days prior to the date of the hearing.

Amendments to be submitted for HUD approval will be available for public comment for a period of thirty days, and in the same manner as the Consolidated Plan, a summary of comments and views (both accepted and not accepted) will be included as an attachment to the amendment.